

national origin of the consumer involved. Notices posted in personnel areas, personnel handbooks, inter-office memos, inclusions in orientation and training sessions, payroll "stuffers" and the like are to be considered as acceptable means for periodically reminding the personnel of the policy.

- The review is to include an analysis of the agency's workforce in respect to the rate at which minority persons are employed and the distribution they enjoy from the lowest positions to the highest classifications across all unit lines. If the agency has recently completed either an EEO-4 form for submission to the Equal Employment Opportunity Commission or has recently compiled a report to the U.S. Civil Service Commission which includes a race - classification breakdown, a copy of such a report can be accepted for this portion of the review.
- The reviewer will perform a random or scientific sample of the cases, using a statistically significant number of cases, to ascertain the rate at which each minority group specified in the Department's uniform race data code are being served in the various programs.
- The reviewer will collect and analyze data as to the numbers of consumer/employee complaints alleging discrimination which have been filed against the agency in the two calendar years preceeding the review.
- The reviewer will ascertain the number of Fair Hearings requests filed as a result of the agency's action in the calendar year preceeding the review by contacting the State Fair Hearings Section inside OSMW. No review that does not include this data will not be considered complete.

c. For the State Welfare Agency

The Office will continually conduct program analysis and data gathering functions to verify and/or maintain the compliance status of the State agency. Since the State agency does not interact directly with consumers its compliance status, as a working body, will be determined on the equitability of the policies it adopts, the equitability of its expenditure patterns, and the vigor with which it keeps the compliance status of county welfare departments, children's services boards and providers current. To maintain the department's own compliance status the Office will:

- Review current policies, procedures, standards and practices to ascertain their impact upon minority persons and minority groups within the Public Welfare System.
- Review all pertinent proposed changes in policies, procedures, standards and practices to comment upon the impact they might have upon minority persons and minority groups within the Public Welfare System.

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- Promote and monitor the complete adoption of the Department's uniform race data code so as to continually increase the Department's capability of assessing the racial consequences of its operations.
- Advise and assist the Director and those units of the Department that are responsible for programs to improve the equitability with which the programs operate.
- Promote and assist in the expansion of those staff development activities which will result in new personnel and continuing personnel being more informed of the nondiscrimination policy.
- Administer the creation and distribution of informational materials so that consumers, providers, contractors, and agencies will be adequately informed of their respective rights and responsibilities under the Act.
- Respond promptly and thoroughly to those complaints filed by parties that allege discriminatory patterns or practices or acts on the part of parties who fall under the Office's jurisdiction.
- Maintain a consistent and timely schedule for the on-site review of group-care facilities, welfare agencies, and individual providers.
- Retain such records and issue such reports as will enable departmental administrators to ascertain the equitability of the Department's operations and take corrective action when and where necessary.

Merit System Standards of Personnel Administration

The Ohio Department of Public Welfare is a grant-in-aid agency receiving Federal financial assistance through the U. S. Department of Health, Education and Welfare. The department is also subject to the authority of the State Merit Agency, the Ohio Department of Administrative Services - Division of State Personnel and Division of Equal Employment Opportunity. Pursuant to the above authorities and the laws and regulations under which they are empowered, the Department practices the principles of Affirmative Action and Equal Employment Opportunity.

The Department has codified the manner and extent to which it can successfully expand employment opportunities for minority-group members and women. These procedures, activities, goals and timetables are contained in the Affirmative Action Plan adopted by the Director of Public Welfare. The AAP has received the conditional acceptance of both the U. S. Civil Service Commission and the Ohio Department of Administrative Services - Division of EEO. The plan is currently undergoing annual revision and will be resubmitted to the proper authorities in July 1974. The 1974 - 1975 Plan will reflect the comments made by the reviewing authorities and is intended to satisfy Title VII requirements fully.

The Office of Personnel Policy and Civil Rights Compliance, acting on behalf of the Department, will provide technical assistance and advice to providers, providing facilities and local welfare agencies to aid these parties in their efforts to expand their Equal Employment Opportunity practices. Such technical assistance and advice will be made available to these parties after the Office has received a written request for same from a responsible party.

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The Department believes that the Ohio Department of Administrative Services - Division of State Personnel and Division of Equal Employment opportunity are solely authorized to require county welfare departments to practice EEO/Affirmative Action principles. These state units are also responsible for the setting of job qualifications, classification standards, selection procedures, promotional factors etc. within the Merit System of Personnel Administration.

The Department understands that it has no authority under which it can insist upon an individual provider, contractor or facility beginning or expanding the practice of EEO/Affirmative Action. The Department will gather personnel profiles on the staffs of such parties and include the racial data among the other factors it considers in determining whether consumers are being served without regard to race, color or national origin.

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